

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION**

IN RE: )  
 ) CASE NO. 16-42570-PWB  
Kristopher Oneal Calhoun and )  
Jessica Leigh Calhoun, )  
 ) Chapter 13  
Debtors. )

**MOTION FOR AN EXPEDITED HEARING ON OBJECTION TO CLAIM**

Debtor hereby moves this Court pursuant to Bankruptcy Rule 9006, for an expedited hearing on the Debtor's Objection to Claim, respectfully stating:

1.

Debtor requests, on an expedited basis, a hearing on the Objection to Claim that was filed on August 28, 2020. (Doc. 60). This Objection was set for a hearing on October 7<sup>th</sup> but service was not perfected and as a result the hearing must be reset. The Debtors have enough funds from the sale of their house to pay off 100% of their creditors and the Trustee has already held the funds from the sale in excess of 20 days. After this Objection is heard, the Trustee can pay the claims and release the excess funds so that the Debtors and their 4 children and pets can move into the new home that they have agreed to purchase with the excess funds.

**WHEREFORE**, Debtors respectfully request that this Court grant this relief and allow for an expedited hearing on the Debtors' Objection to Claim, and seek an Order from the Court as follows:

- a) Approving Debtors' Motion for an Expedited Hearing on the Objection to Claim; and

b) For such relief as this Court may deem just and appropriate.

This 13th day of October, 2020.

Respectfully Submitted,

/s/

Dan Saeger  
Attorney for Debtors  
Georgia Bar No. 680628

SAEGER & ASSOCIATES, LLC  
706 S Thornton Ave Ste D  
Dalton, GA 30043  
(P) 706-529-5566  
dan@whitfieldcountylaw.com

**CERTIFICATE OF SERVICE**

I, Dan Saeger, certify that I am over the age of 18 and that on this date, I served a copy of the foregoing **Motion for an Expedited Hearing** by First Class Mail, with adequate postage prepaid on the following persons or entities at the addresses stated:

Jefferson Capital Systems, LLC  
Attn Stephen Dirksen – Bankruptcy Specialist  
PO Box 7999  
Saint Cloud, MN 56302-9617

Jefferson Capital Systems, LLC  
16 McLeland Road  
St. Cloud, MN 56303

Jefferson Capital Systems, LLC  
Corporation Service Company - Registered Agent  
40 Technology Pkwy S, Ste 300  
Norcross, GA 30092

Mary Ida Townsend  
Chapter 13 Trustee  
285 Peachtree Center Ave  
Suite 1600  
Atlanta, GA 30303

This 13th day of October, 2020.

/s/  
Dan Saeger  
Attorney for Debtors  
Georgia Bar No. 680628

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Dalton, GA 30043  
(P) 706-529-5566  
dan@whitfieldcountylaw.com